it negligence per se to allow overcrowding. Pennsylvania requires toward one necessarily on the platform only such care as toward any other passenger. *Pildish* v. *Ry.*, 61 Pa. Super. Ct. 195. In this case the theory of the *Camden* case, supra, was followed, it being held that one remaining on the platform when he might have had standing room inside assumes all the risks of his position. But this is contrary to the weight of authority.

CONSTITUTIONAL LAW—INTERSTATE COMMERCE AND POLICE POWER.—The Federal Supreme Court on January 22, 1917, rendered decisions in three cases, appealed from the district courts of Michigan, South Dakota and Ohio, wherein the so called "Blue Sky" laws were upheld as constitutional These laws get their popular name from the fact that they were made to regulate those promoters whose promises were "as limitless as the blue sky." Briefly stated, it was held that reasonable restrictions upon the operations of those engaged in the sale of "securities" was not a violation of the interstate commerce clause but was a justifiable exercise of the police power of the state. *Merrick* v. *Halsey & Co.,* (Michigan), 37 Sup. Ct. 227; *Caldwell* v. *Sioux Falls Stock Yards Co.,* (South Dakota), 37 Sup. Ct. 224, and *Hall* v. *Geiger-Jones Company,* (Ohio), 37 Sup. Ct. 217.

A full discussion of these cases appears on pages 369-385 of this issue.

CONSTITUTIONAL LAW—RELIGIOUS LIBERTY.—A statute of Alabama made it a misdemeanor for any person to treat or offer to treat diseases of human beings by any system of treatment whatsoever without a license. CODE, §7564. An ordinance of the city of Birmingham made all misdemeanors against the laws of the State also offences against the city. Defendant, who was not a licensed physician, employed prayer in treating a patient for various diseases, but also examined and massaged the affected parts. He contended that he was exercising his religion as embraced in the teachings of the Altrurian Church, and that the ordinance denied religious liberty in violation of the Constitutions of the United States and the State of Alabama. *Held,* that the ordinance was constitutional and also that the defendant practiced medicine without a license within the meaning of the ordinance. *Fealey* v. *City of Birmingham,* (Ala. 1916) 73 So. 296.

It is well settled that the regulation of the practice of medicine is a valid exercise of the police power. *State* v. *McAninch,* 172 Ia. 96, 154 N. W. 399; *People v. Tom J. Chong,* 28 Cal. App. 121, 151 Pac. 553; *In re Ambler,* 11 Okl. Cr. 449, 148 Pac. 1061; *McNaughton* v. *Johnson,* 37 Sup. Ct. 178. The principal case did not decide that prayers alone without recourse to material or human agencies would constitute practicing medicine under the statute, since the defendant did not limit his operations to mere prayers. This question was decided in the case of *People* v. *Cole,* (N. Y. 1916) 113 N. E. 790. In that case the defendant was indicted for practicing medicine without registration. At the trial he proved that he was a member of the Christian Science Church and that he gave a "treatment" by interposing with God that the disease might be cured, it being a tenet of the church that such prayer would completely cure the disease. The court in deciding the case